



rec'd 11/21/07

November 19, 2007

Mr. Jeremy Johnstone
U.S. Environmental Protection Agency – Region 9
Clean Water Act Compliance Office, WTR-7
75 Hawthorne Street
San Francisco, CA 94105

Our file: 11-WL-D5380-436

Re: Findings of Violation & Order for Compliance (copy enclosed)
EPA Docket No. CWA 309(a)-08-015
Notice Dated November 9, 2007

Dear Mr. Johnstone;

With reference to the Order for Compliance included in the docket documents received, we are hereby responding as confirmation to abatement of the items noted under paragraph number 25 on page number 5 of the document.

Response is offered as follows:

- a. **Place drums on spill pallets and under cover in vehicle maintenance area** – Please reference the attached photos #1 and #2 in the following pages, and note the spill containment pallets and the area shelter utilized for protection. The persons responsible for effecting abatement and overseeing continued proper procedures are the Maintenance & Repair Managers Stacey Collette, Holly Lewandowski, and Robert Avelar.
- b. **Clean oily parts on the ground in the vehicle maintenance area** – Please reference the attached photos #3 through #7 noting clean up of oily parts and work areas at the Maintenance & Repair power shop and container inspection areas. The persons responsible for effecting abatement and overseeing continued proper procedures are the Maintenance & Repair Managers Stacey Collette, Holly Lewandowski, and Robert Avelar.
- c. **Remove accumulated trash and debris throughout trailer parking areas and at fence line of the facility** - Please reference the attached photos #8 through #16, which depict the clean up of container storage areas and the perimeter fence area. The person responsible for effecting the abatement, and overseeing continued proper address is the Yard Operations Manager, Nick Uruburu.

The abatement efforts so noted intend to meet compliance for the 30-day response requirements, and are offered for your review and concurrence. In the event we have overlooked any measure or item for this portion of compliance, we ask that it be brought to our attention, so as to enable our further address.

We bring to your attention our recognition that this submission addresses only the 30-day listed items in the Order for Compliance, and that we are very aware of our obligation to submit (1) a revised SWPPP; (2) a monitoring program; and (3) a cost analysis of the revised SWPPP. These items are currently in progress with anticipation of their being submitted well within the 60-day demand period.

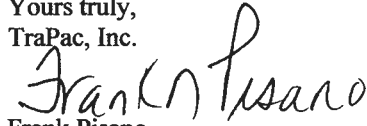
Thank you and your offer of compliance approval is awaited.

TraPac, Inc.

920 W. Harry Bridges Blvd., • Wilmington, California 90744-5230
P.O. Box 1178 • Wilmington, California 90748-1178
(310) 830-2000 • FAX (310) 513-7410

November 19, 2007
Mr. Jeremy Johnstone
U.S. Environmental Protection Agency – Region 9
Page – 2

Yours truly,
TraPac, Inc.



Frank Pisano
Vice President

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PR/pr

Enclosure

Cc Mr. Ivar Ridgeway
California Regional Water Quality control Board – Los Angeles Region
Coastal Storm Water Unit
310 West 4th Street, Suite 200
Los Angeles, CA 90013

Photo #1

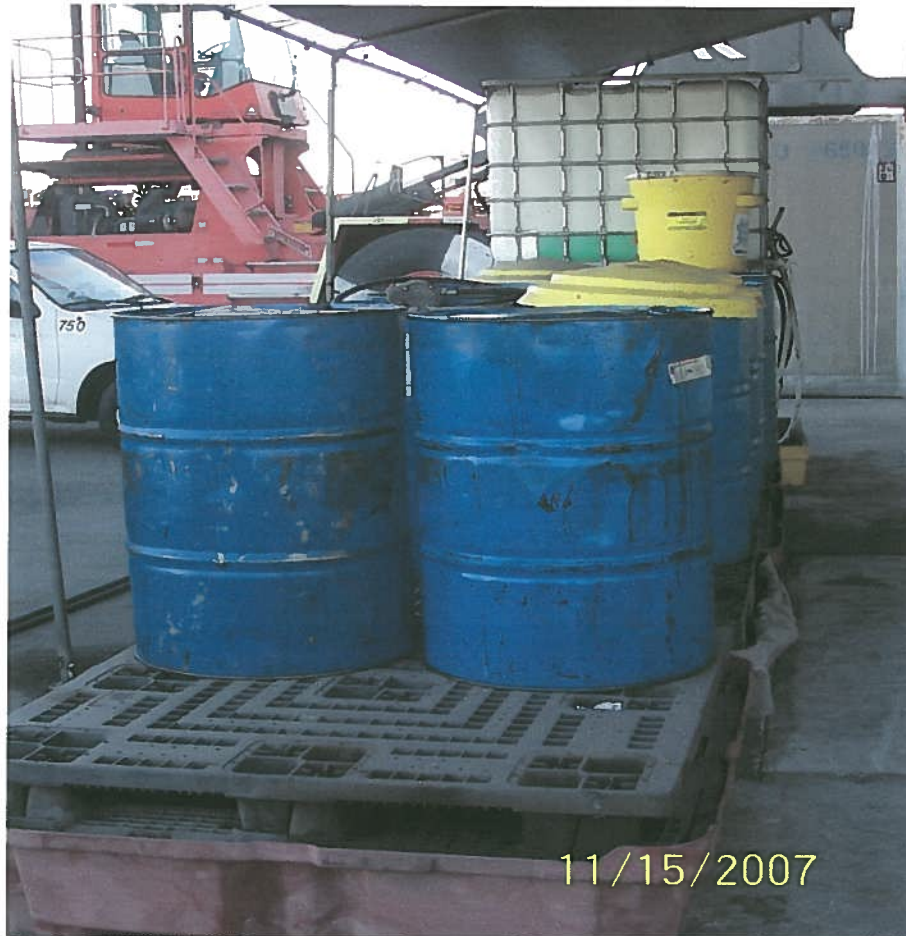


Photo #2



Photo #3



Photo #4



Photo #5



Photo #6



Photo #7



Photo #8

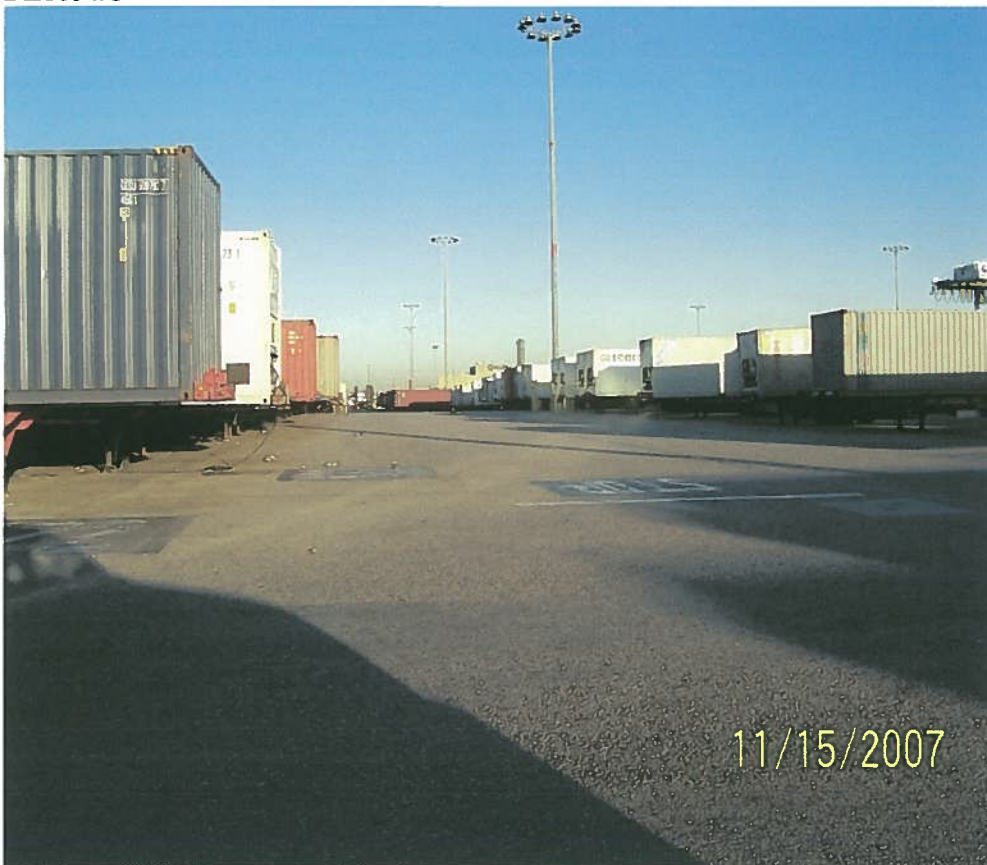


Photo #9



Photo #10



Photo #11



Photo #12



Photo #13

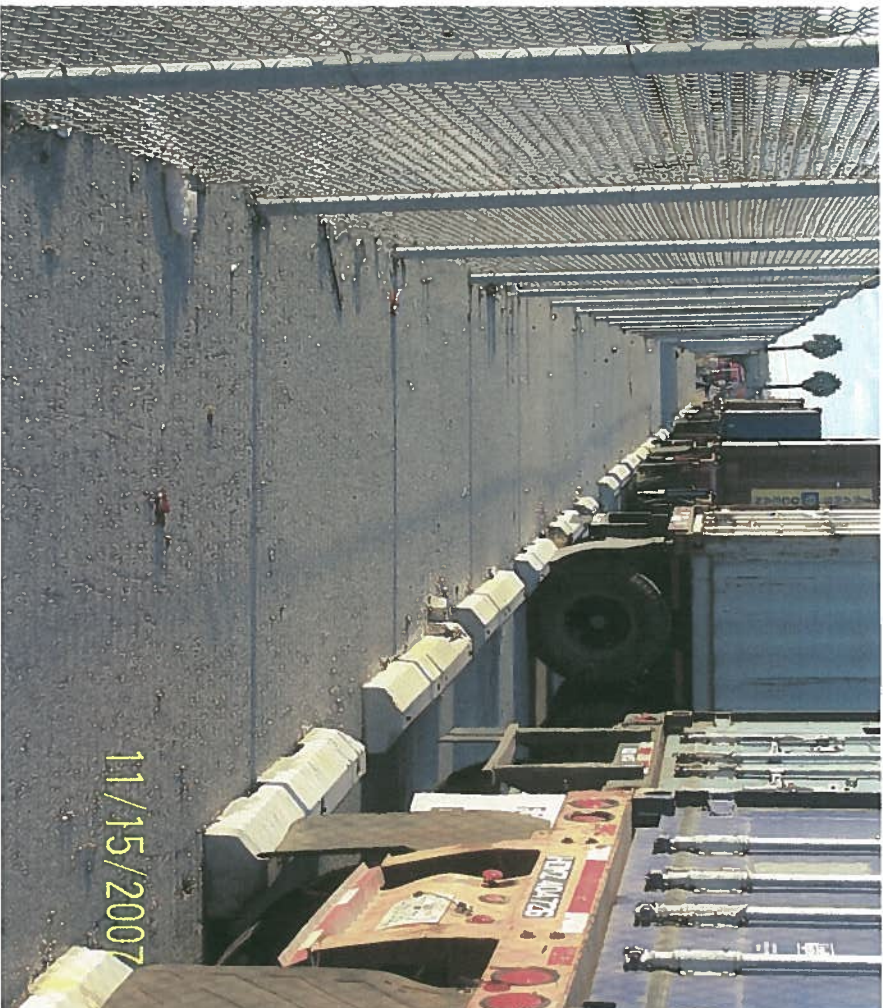


Photo #14

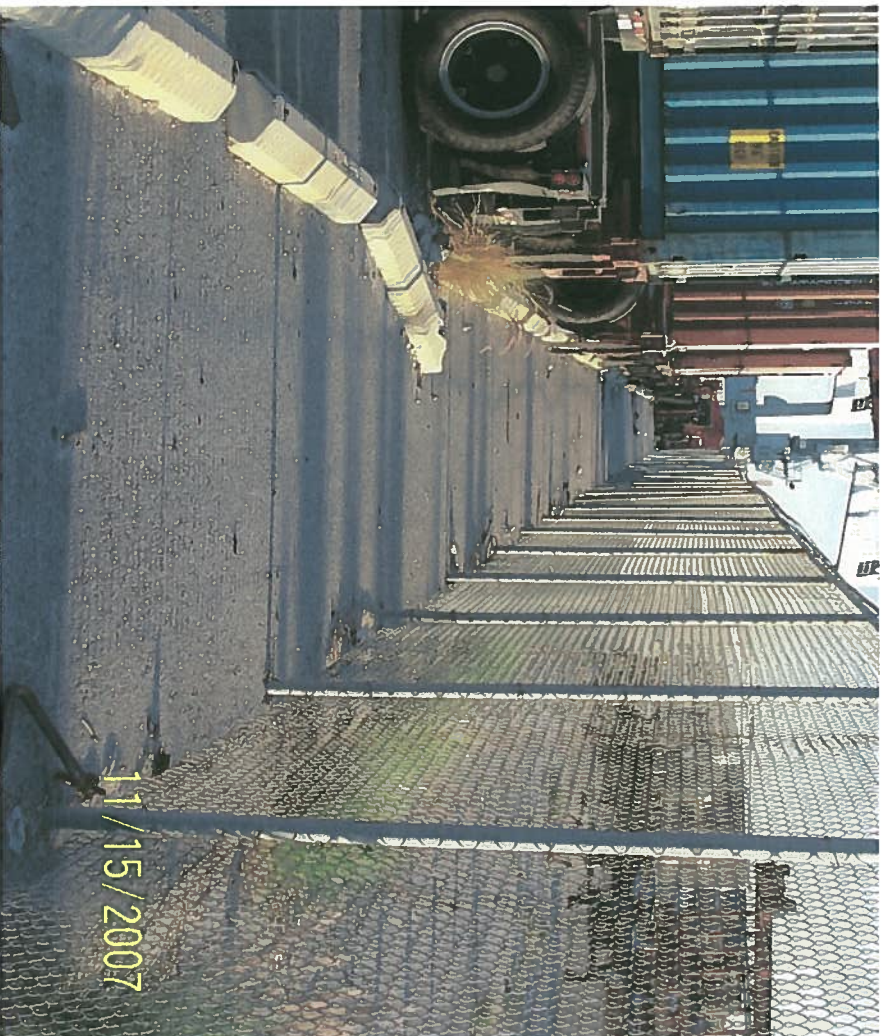


Photo #15



Photo #16

